

BARKSDALE SCHOOL PORTRAITS, LLC, d/b/a HOCKMEYER WITH BARKSDALE, and BSP NEW ENGLAND, LLC d/b/a HOCKMEYER WITH BARKSDALE,	:	
	:	
Plaintiffs,	:	Civil Action No. 20-cv-11393-IT
	:	
	:	Civil Action No. 20-cv-11640-IT
	:	
	:	(Partially Consolidated for
	:	Discovery and Scheduling Purposes)
	:	
v.	:	
	:	
ELIZABETH HOCKMEYER WILLIAMS, and E-LLUMINATIONS,	:	
	:	
	:	
Defendants.	:	
	:	

Plaintiffs Barksdale School Portraits, LLC and BSP New England, LLC d/b/a Hockmeyer with Barksdale and Counterclaim Defendants Wayne Barksdale and Susan Sheridan Barksdale (“Hockmeyer with Barksdale” or “Plaintiffs”) hereby respectfully move this Honorable Court for leave to file a reply brief in further support of Plaintiffs’ Motion for Sanctions [ECF 46] (“Reply Brief”). This Reply Brief is necessary to address erroneous points of law and arguments in the response brief of the Defendant/Counterclaim/Cross-Claim Defendant Elizabeth Hockmeyer Williams and her attorney, Jeff Rosin, in opposition to Plaintiffs’ motion.

The proposed reply brief is submitted with this Motion (attached as Exhibit A).

Respectfully submitted,

Dated: May 21, 2021

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BARKSDALE and BSP NEW ENGLAND, LLC,  
Wayne Barksdale, and Susan Sheridan-Barksdale*

**CERTIFICATE OF SERVICE**

I, Michael D. Homans, hereby certify that on this 21st day of May 2021, a true and correct copy of the within Plaintiffs' Motion for Leave to File Reply Brief in Further Support of Plaintiffs' Motion for Sanctions was filed using the Court's electronic filing system and served upon all counsel of record via ECF notification.

*s/ Michael D. Homans*

MICHAEL D. HOMANS